

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re: ) Chapter 11  
W. R. GRACE & CO., et al.<sup>1</sup> )  
Reorganized Debtors. ) Case No. 01-01139 (KJC)  
 ) (Jointly Administered)  
 )  
 ) **Re: Docket No. 31812, 31856 and 31873**  
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**CERTIFICATION OF COUNSEL REGARDING AMENDED ORDER APPROVING  
AMENDED STIPULATION FOR BRIEFING SCHEDULE AND HEARING DATE FOR  
ANDERSON MEMORIAL HOSPITAL'S MOTION TO ALTER OR AMEND  
ORDER DENYING MOTION FOR CLASS CERTIFICATION**

1. On March 5, 2014, Anderson Memorial Hospital ("AMH") filed its *Motion to Alter or Amend Order Denying Motion for Class Certification and for Entry of Scheduling Order and Granting Related Relief* (the "Motion") [Docket No. 31812]<sup>2</sup>.
2. On March 18, 2014, the Court entered the *Order Approving Stipulation for Briefing Schedule and Hearing Date for Anderson Memorial Hospital's Motion to Alter or Amend Order Denying Motion for Class Certification* (the "Order") [Docket No. 31873].
3. Attached hereto as Exhibit A is a copy of a proposed form of *Amended Order Approving Amended Stipulation for Briefing Schedule and Hearing Date for Anderson Memorial Hospital's Motion to Alter or Amend Order Denying Motion for Class Certification* (the

<sup>1</sup> The Reorganized Debtors comprise the following 17 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co. Conn., Darex Puerto Rico, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Gloucester New Communities Company, Inc., Grace Chemical Company of Cuba, Grace Energy Corporation, Grace Europe, Inc., Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace PAR Corporation, W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Guanica Caribe Land Development Corporation, Hanover Square Corporation, Kootenai Development Company, Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), and Water Street Corporation.

<sup>2</sup> Capitalized terms not defined herein shall have the meaning ascribed to them in the Motion.

“Amended Order”). A copy of the Amended Stipulation is attached to the Amended Order as Exhibit 1 thereto.

4. Circumstances unrelated to the Motion or the dispute between AMH and W. R. Grace & Co., et al. (“Grace”), resulted in AMH’s counsel requesting an adjustment to the schedule for the filing of its Reply. The parties consented to adjust the briefing schedule and hearing.

5. This draft Amended Order has been circulated to counsel for AMH and counsel has agreed to the form of the Amended Order.

6. By way of this certification, the Reorganized Debtors respectfully request that the Court enter the Amended Order, thereby approving the terms of the Amended Stipulation.

*[Remainder of Page Intentionally Left Blank]*

7. Counsel for the parties are available, should the Court have any questions or concerns with the foregoing or the Amended Order.

Dated: April 24, 2014

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